DOCUMENT RESUME

ED 178 644 UD 019 882

TITLE Annual Program Plan, Fiscal Year 1980, Title I ESEA.
INSTITUTION Kansas State Dept. of Education, Topeka.
PUB DATE 12 Jun 79
NOTE 58p.

EDRS PRICE MF01/PC03 Plus Postage.
DESCRIPTORS *Compensatory Education Programs; *Educational Finance; Educationally Disadvantaged; Elementary Secondary Education; *Federal Aid; *Federal Legislation; Federal Programs; National Programs; Program Administration; Program Evaluation; *Program Planning; Program Validation; State Programs
IDENTIFIERS *Elementary Secondary Education Act Title I; *Kansas

ABSTRACT

The major focus of this report is on the Kansas State Department of Education's (KSDE) plan for the expenditure of Title I funds in Kansas. Specific information provided includes: (1) an overview of Title I administration; (2) Federal, State, and local school district reponsibilities for Title I; (3) KSDE's monitoring and enforcement plan; (4) a historical summary of Title I funds distribution in Kansas; (5) Federal and State funding formulas; (6) criteria for approving local programs; (7) program administration in Kansas; and (8) the four components of Title I. Data showing the participation of unified school districts, Title I staffing, and the progress of the program in Kansas on the national level are provided. Appendices include Kansas's state education agency (SEA) monitoring report form and a Kansas Title I Program Compliance Audit Review. (EB)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED178644

ANNUAL PROGRAM PLAN

FISCAL YEAR 1980

TITLE I, ESEA

Approved by Governor John Carlin
April 30, 1979

Approved by State Board of Education
June 12, 1979

Kansas State Department of Education
Kansas State Education Building
120 East 10th Street Topeka, Kansas 66612

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

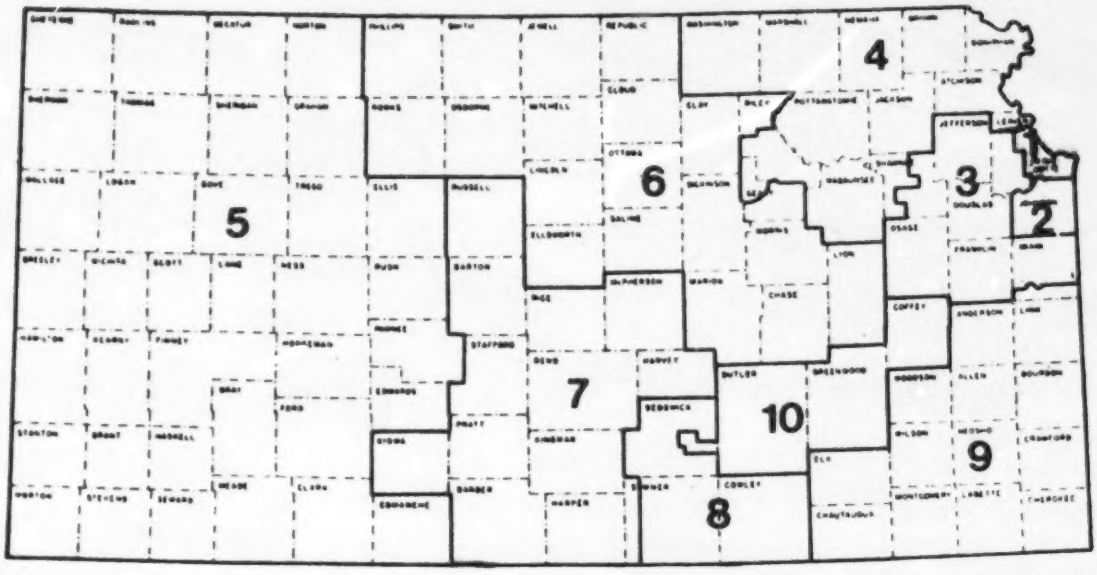
N. Flott

Kansas State Dept of Ed

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

UD019882

KANSAS STATE BOARD OF EDUCATION
DISTRICTS



STATE BOARD OF EDUCATION

Kay Groneman
District 1

Ruthann Oelsner
District 2

George Frey
District 3

Dorothy G. Groesbeck, Chairman
District 4

Harold H. Crist
District 5

Marilyn Harwood
District 6

John Bergner
District 7

Tim Hiebert
District 8

Denise Apt
District 9

Evelyn Whitcomb
District 10

STATE OF KANSAS

ELEMENTARY AND SECONDARY EDUCATION ACT TITLE I - FINANCIAL ASSISTANCE TO MEET SPECIAL EDUCATIONAL NEEDS OF CHILDREN

I, the undersigned authorized official for the Kansas State Department of Education, in accordance with Section 162 of the Elementary and Secondary Education Act, as amended by Public Law 95-561, hereby apply for participation in the following educational programs:

a. Financial assistance for programs operated by local education agencies for educationally deprived children residing in school attendance areas with high concentrations of children from low-income families and institutionalized neglected and delinquent children.

b. Financial assistance for programs operated by State agencies directly responsible for the free public education of neglected or delinquent children in State-operated or supported schools.

The Kansas State Department of Education will comply with the assurances in the General Application required by Section 435(b) of the General Education Provisions Act.

Enclosed is the Monitoring and Enforcement Plan, as required by Section 171, for Fiscal Years 1980, 1981, and 1982.

June 12, 1979
Date

Merle P. Bolton
Chief State School Officer

Commissioner's Approval

Approved _____
U.S. Commissioner of Education

Date _____

Certificate Regarding Legal Authority

The Kansas State Department of Education has the authority under State law to perform the duties and functions of a State education agency under Title I of the Act and the regulations in 45 CFR Part 116, including those arising from the assurances in Sec. 435(b) of the General Education Provisions Act.

Signature Robert Stephan

Name Robert Stephan

Official Title Attorney General

Date May 14, 1979

State Plan for Fiscal Year 1980
Title I, ESEA

The following are the comments received from the State Governor on the Annual Program Plan.

STATE OF KANSAS

RECEIVED
MAY 4 1979
COMMISSIONER
OF EDUCATION (B)

OFFICE OF THE GOVERNOR
State Capitol
Topeka 66612

John Carlin Governor

April 30, 1979

Commissioner Merle R. Bolton
Kansas State Department of Education
120 East 10th Street
Topeka, Kansas 66612

Dear Commissioner Bolton:

I have reviewed this year's Plan for the expenditure of Title I funds and am pleased that you are undertaking an evaluation of the long-term effects of participation in the Title I program. Such an evaluation will be useful to me and should prove of value to your Department and school districts in evaluating the long-term effects of remedial education and related services.

Sincerely,

JOHN CARLIN
Governor

JC:ssg

TABLE OF CONTENTS

Page

INTRODUCTION i

CHAPTER ONE

Program Administration 1
Overview of Administration 1
USOE's Specific Responsibilities for Title I (A Summary) 2
KSDE's Specific Responsibilities for Title I (A Summary) 2
Basic Local Education Agency Requirements in the Formal Legal Framework 3
The Local School Districts' Specific Responsibilities for Title I 4

CHAPTER TWO

Title I Monitoring and Enforcement Plan 7

CHAPTER THREE

Title I, ESEA in Kansas 13

CHAPTER FOUR

Finance 15
The Federal Formula for Allocating Funds 15
The State Funding Formula 15

CHAPTER FIVE

Approval of Programs 17
The Criteria for Approving Local Programs 17

CHAPTER SIX

Program Administration in Kansas 19

CHAPTER SEVEN

The Four Components of Title I 23

CHAPTER EIGHT

Participation of Unified School Districts 25
Title I Staffing - Fiscal Year 1978 25

CHAPTER NINE

Progress of the Program in Kansas 27
Student Achievement Information 27
Kansas Program Achievements - Regular Term 27
Sustained Effects of Title I 28
Three-Year Aggregate Average Rates of Gain — Grade Equivalent Metric (Years/Months of Gain per Year/Month of Instruction) For Various Lengths of Title I Participation 29

CHAPTER TEN

Progress of the Program on the National Level 31
Is Title I Working on a National Level? 31

CHAPTER ELEVEN

The Future of Title I 33

APPENDICES

Appendix A — Kansas SEA Monitoring Report Form 37
Additional Monitoring Items for Institutionalized Neglected or Delinquent Children in State-Operated or Supported Schools 48
Appendix B — Kansas Title I Program Compliance Audit Review 49

TITLE I, ESEA
SUPPLEMENT TO THE
ANNUAL PROGRAM PLAN
1979

INTRODUCTION TO TITLE I, ESEA

Title I of the Elementary and Secondary Education Act is the largest federal aid to education program. It was the first and most important federal program assigned to the U.S. Office of Education to recognize that economically and educationally deprived school children may need extra help.

Title I provides financial assistance to local school districts in planning and operating special programs for educationally deprived children. It is a supplementary program, designed to upgrade the educational opportunities for children who are not performing at the expected grade level appropriate for children their age.

State and local education agencies have been given the responsibility of developing and implementing programs to provide additional educational services to disadvantaged children who need it most by assessing the particular educational needs and devising individual educational prescriptions to meet those needs.

The Law and Its Purpose

Title I of ESEA is a part of the first large step taken by the federal government in the area of public education in America. Previously, education had generally been considered to be within the exclusive province of local government and state government. This major federal involvement was the 1965 Elementary and Secondary Education Act (ESEA). The National Defense Education Act (NDEA) of 1958 and the Vocational Education Act of 1963 predate ESEA, but they were on a much smaller scale. ESEA, or P.L. 89-10, was conceived at a time of great public debate and activity in the area of civil rights and its leading edge (Title I) reflects this. Title I (ESEA) is concerned with "compensatory education" for those children of socio-economically alienated families who are (although just beginning life) already behind their peers in the basic academic skill areas (generally reading and math). Title I and the other titled programs of the ESEA are essentially part and parcel of the federal government's established attempt to bring about social change in the country via the provision of funds for specific uses and toward specific goals. The Title I effort provides funds that allow extra efforts in the schools on the task of bringing certain children up to that point where they are getting an "equal start" with their peers.

Federal Policy

The policy of United States (as declared by the Congress on April 11, 1965) is as follows:

> ***In recognition of the special educational needs of children of low-income families and the impact that concentrations of low-income families have on the ability of local education agencies to support adequate educational programs, the Congress hereby declares it to be the policy of the United States to provide financial assistance (as set forth in Title I) to local education agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means which contribute particularly to meeting the special educational needs of educationally deprived children.***

Critical Mass Concept

The obvious trend is that there are generally increasing amounts of money being allocated for Title I, while at the same time, increasingly fewer children are being served. This is by design and based on a conclusion generally supported by most involved that a certain higher level of support ($300 per child) is a necessary threshold for having impact on the child's performance. This "critical mass" or "threshold" concept was first articulated as a high level guideline or policy by President Nixon in his 1972 message to Congress in which he stated:

> ***For some years now, there has been a running debate about the effectiveness of added spending for programs of compensatory or remedial education. Some have maintained there is virtually no correlation between dollar input and learning output; others have maintained there is a direct correlation; experience has been mixed.***
>
> ***While there is a great deal yet to be learned about the design of successful compensatory programs, the experience so far does point in one crucial direction: to the importance of providing sufficiently concentrated funding to establish the educational equivalent of a 'critical mass,' or threshold level. Where funds have***

been spread too thinly, they have been wasted or dissipated with little to show for their expenditure. Where they have been concentrated, the results have been frequently encouraging and sometimes dramatic.

A second generally accepted conclusion that has emerged at the national level is that success is more likely not only when funds are concentrated but as well when they are concentrated on children in the lower grade levels.

CHAPTER ONE

PROGRAM ADMINISTRATION

USOE[1] develops regulations and guidelines for administering the Title I program and provides consulting services to SEA's[2].

USOE To participate in the program, states are required to submit applications to USOE for review and approval. Each state is required to ensure that it will administer the program and submit reports in accordance with the act and USOE Title I program regulations.

KSDE Kansas State Department of Education's major responsibilities are to:

- approve or disapprove project applications submitted by local education agencies after determining whether the projects are designed to comply with the intent of Title I,
- ensure that Title I funds are used for approved projects, and
- adopt fiscal control and accounting procedures to ensure that federal funds received from USOE are properly disbursed and accounted for.

The act authorized payments to a state to defray its cost of administering the program and of providing technical assistance to local education agencies. The law authorizes 1.5 percent of the total grants available with a minimum guarantee of $225,000.

Local education agencies, which administer public education up to and including grade 12 in a county, township, or other school district, are responsible for developing and implementing Title I programs. The term "program" refers to all the projects which a local education agency proposes under Title I. The program may consist of one or more projects, and each project is generally subdivided into project activities.

Local USD's and Agencies Local education agencies are responsible for determining school areas eligible for participation, identifying the educationally deprived children in these areas, determining the special needs of such children, developing projects responsive to the priority needs of these children, adopting procedures for evaluating the effectiveness of major project activities, submitting applications to the state education agency for grants, and carrying out the projects in accordance with their approved applications and USOE regulations.

Children in private schools are to be given an opportunity to participate in the Title I program on the same basis as public school children. Local education agencies are to maintain administrative direction and control over Title I activities conducted in private schools.

OVERVIEW OF ADMINISTRATION

Although Title I provides funding for local education agencies, it is not a simple program of grants to jurisdictions. Title I funds are distributed to local education agencies, but their use is limited to special educational services for educationally disadvantaged children residing in low-income areas. In order to ensure that the state and the local districts understand and comply with the purposes of the program, the federal government develops and disseminates official policies about the implementation of the program. The

---

[1] USOE refers to the U.S. Office of Education which is, in turn, a section of the Department of Health, Education and Welfare. USOE is the administrative body for federal education programs along with the more recently formed National Institute for Education (NIE).

[2] SEA refers to the primary state education agency which is the Kansas State Department of Education (KSDE) in Kansas.

Department of Health, Education, and Welfare uses two principal methods in developing such policies and communicating them to the state and local districts. The first method entails issuing general policies about program implementation. The second method consists of monitoring and enforcing compliance with the existing rules.

The state exercises important influence over the operation of the Title I program. State rulemaking and management, which include responsibility for the actual approval and review of district activities, have an impact on programs over and above that extended by the federal legal framework and federal administration. In performing its responsibilities, the state is expected to complement federal management and implement congressional policy. It is expected to provide managerial direction to school districts so that quality services of a supplementary nature are delivered at the local level to the intended beneficiaries.

The current legal framework provides eleven major administrative responsibilities for the states, including

- grant distribution,
- application approval,
- rulemaking and interpretation,
- monitoring,
- enforcement,
- technical assistance,
- information dissemination,
- fiscal management,
- evaluation,
- reporting to the federal government, and
- complaint resolution.

USOE'S SPECIFIC RESPONSIBILITIES FOR TITLE I

The Elementary and Secondary Education Act and its amendments include the following tasks as the responsibilities of the Commissioner of Education and/or the Office of Education:

1. Determine the funding allocation for eligible counties, state education agencies, outlying territories, and the Bureau of Indian Affairs in the U. S. Department of the Interior.
2. Approve applications from state education agencies for statewide Title I programs.
3. Withhold funds from any state education agency which fails to fulfill its obligations under Title I.
4. Develop and disseminate regulations, program guides, and other materials affecting the administration of Title I.
5. Monitor state and local Title I programs.
6. Provide technical assistance to state education agencies and, with state approval, to local school districts.
7. Require parental involvement in programs which would benefit from it.
8. Inform the public about federally supported education programs.
9. Compile fiscal, statistical, and program reports evaluating the effectiveness of Title I for submission to Congress and use by the general public.

KSDE'S SPECIFIC RESPONSIBILITIES FOR TITLE I

Among the specific duties of the State Department of Education according to Title I law and regulations are as follows:

1. Administer the statewide Title I program.
2. Apply for funds, plan, operate, and evaluate statewide Title I programs for migrant children, children in state institutions for the neglected or delinquent, and handicapped children.
3. Apply for incentive grants if eligible.
4. Approve or reject local Title I applications on the basis of their following Title I regulations.
5. Divide basic Title I grant money among local school districts.
6. Assist local school officials in the development of Title I projects.
7. Monitor local Title I projects.

8. Submit assurances to the Office of Education that Title I regulations are being followed in the state.
9. Maintain fiscal records of all grant funds.
10. Compile reports as needed, based on information gathered from local school districts, to submit to the Office of Education.
11. Investigate complaints about local Title I activities and report back to the complainant.
12. Complete evaluation and dissemination responsibilities of the State for its Title I program.
13. Audit compliance agreements and resolution.

BASIC LOCAL EDUCATION AGENCY REQUIREMENTS IN THE FORMAL LEGAL FRAMEWORK

The formal legal framework contains fourteen major program requirements governing either funds allocation or program development. The funds allocation requirements are intended to ensure that Title I funds are used for the intended beneficiaries and that state and local funds are distributed so that Title I dollars actually add to expenditures for the target population. The program development requirements establish the nature of services to be provided at the local level and procedures for guaranteeing their quality.

1. ***Eligibility*** criteria delineate which school districts are eligible to receive assistance under Title I, define eligible schools as those with attendance areas having high concentrations of children from low-income families, and identify the class of potential recipients as children who are educationally deprived.
2. The ***targeting*** standards determine which of the eligible areas and children will in fact be served.
3. ***Maintenance of effort*** provisions apply to district-level expenditures and require that funding from state and local sources does not decrease. Without such provisions, the state or districts could substitute Title I dollars for their own money and maintain the same level of overall educational expenditures. The requirement is designed to ensure that federal assistance serves a supplemental rather than a basic education function and that Title I grantees not shift ongoing financial responsibility for basic education programs to the federal government.
4. ***Comparability*** requirements apply at the school level to the services provided from state and local funds. Generally, they require that the level of these services in every Title I school be comparable, i.e., roughly equal, to the average level in non-Title I schools. They are designed to ensure that federal assistance is not used to support a level of services that is already available in non-Title I schools in the district. Comparability is generally measured in terms of two ratios: pupil to staff and expenditures per pupil for instructional salaries.
5. ***Supplement-not-supplant*** requirements apply at the child level and to the use of funds. They are intended to ensure that Title I funds are added to, and not used to replace, state and local funds. Children in Title I programs must receive the level of state and local funds they would have received if Title I did not exist.
6. The ***excess cost*** requirement clarifies the supplanting provisions by stipulating that Title I funds can pay only for the excess costs of Title I programs and projects. If, for example, a district is spending $1,000 per pupil for the regular academic program, and the local Title I program is designed to provide the same program at a more intensive level, Title I may pay only for the costs of the program that are in excess of $1,000 per pupil. The supplement-not-supplant and excess costs provisions are thus closely related. The supplanting provisions prevent local education agencies from penalizing children in Title I programs when allocating state and local funds. The excess cost provision requires that Title I funds pay only the costs of services beyond normal instructional expenditures.
7. ***Equitable provided*** provisions, formerly termed *ordinarily provided*, extend the comparability regulations from the school to the child level and use a different measure of services. The com-

parability requirements are met if broad tests, such as the ratio of pupils to staff in each Title I school are roughly equal to the average pupil/staff ratio in all non-Title I schools.

The equitably provided regulations require that Title I children in Title I schools receive their fair share of specific services in comparison to children in non-Title I schools. These regulations are particularly useful when districts are introducing a new, locally provided service to some but not all children. For example, if a district implemented a limited new program to teach English as a second language, the equitably provided rule requires that Title I children be involved in the new program in relation to their proportion of the total number of children in the district.

8. *General aid* provisions serve as a broad direction to school districts requiring them to serve only "educationally deprived" children with Title I funds and not the student body at large. The regulations that elaborate the other five requirements provide more specific guidance to school districts on the allocation and use of funds. They give practical definition to the supplement-not-supplant, comparability, and excess cost provisions of the statute. These regulations vary according to whether they apply on the district, school, or student level, and whether they refer to funds or to services.
9. The *needs assessment* requirement is the first step in the program development process and involves identifying educationally disadvantaged children and specifying educationally disadvantaged children and specifying their needs. This requirement is intended to ensure that all educationally disadvantaged children residing in low-income areas are identified.
10. The *program design* regulation requires a formal plan establishing objectives for the Title I program and the specification of activities and services to accomplish the desired ends, based on the results of the needs assessment.
11. The *concentration* requirement is intended to ensure that Title I funds provide services of sufficient size, scope, and quality to give reasonable promise to success. This requirement takes an added importance since Title I typically is not fully funded.
12. The *coordination* requirement is intended to prevent from duplicating benefits provided to the target populations ensuring that Title I services are planned in conjunction with other federal and state agency programs.
13. The *program evaluation* requirement provides that the effect of the Title I program be assessed. The results of these assessments should be used by local education agencies in the design of future Title I programs and must be reported to the state education agency.
14. The *parent involvement* requirement prescribes the nature and extent of parental involvement in the development and operation of Title I programs.
15. *Equitable services and expenditures* are provided for eligible private school children.

THE LOCAL SCHOOL DISTRICTS' SPECIFIC RESPONSIBILITIES FOR TITLE I

As part of its responsibilities under Title I, the local education agency must:

1. Identify the educationally deprived children in low-income areas of the school district and determine their special needs.
2. Select eligible attendance centers from these project areas.
3. Design and implement projects, in accordance with Title I regulations and program guides, to meet the educational needs of children.
4. Coordinate Title I with other compensatory education projects in the school district.
5. Submit an application to the state education agency.
6. Maintain fiscal effort with respect to total current expenditures in project areas, ensuring that they are comparable to nonproject areas.

7. Involve parents in the planning, operation, and evaluation of the Title I program.
8. Maintain fiscal records of all Title I money spent and report to the state on the use of these funds.
9. Make information on Title I projects available to parents and the public.
10. Evaluate the local Title I program.

CHAPTER TWO

TITLE I MONITORING AND ENFORCEMENT PLAN

Purpose and Scope of Monitoring

Each Title I project visited by the State Department of Education's staff is reviewed for compliance with all applicable Title I requirements, conformity with the approved applications, and evidence of effectiveness including but not limited to a review of evaluation reports. Included in the Appendix is a copy of the Department's checklists or guides for on-site reviews of projects providing free public education for neglected and delinquent children which are conducted by the local education agency and the State Department of Education.

The primary objective of the monitoring review is to determine if the Title I program is in compliance with federal regulations. Program improvements are emphasized after the programs are brought into compliance with federal regulations.

The scope of the monitoring reviews consists of personal interviews with administrators, teachers, aides, and parents of the local education agency's Title I program as well as review of source data and other documentation used by the local education agency to support the development and operation of the Title I program.

Application

The *Title I Monitoring and Enforcement Plan* applies to local education agencies and State institutions for neglected/delinquent children. A separate monitoring and enforcement plan was developed for State institutions for the handicapped and migrant programs.

Frequency of On-site Reviews

Each local education agency's Title I program has an on-site review by a staff member of the State and Federal Programs Administration Section of the State Department of Education at least once every two years. The monitoring cycle begins the first of October each year and continues through May. The three Title I education specialists are responsible for monitoring an average of two programs per week over a six month monitoring period. The remaining six month time periods are used for application review and approval, program revisions, comparability reviews, financial audit report reviews, budget amendments, purchase approval, workshops attendance, and other office matters.

Method of Selection for On-site Reviews

Each education specialist is assigned one-third of the total local education agencies participating in Title I. Ranking the local education agencies on an allocation basis from low to high, each specialist choses one-half of those above the median and one-half below the median for on-site review during the year. The following year the remaining one-half is monitored.

Each specialist is permitted 10 percent flexibility in selecting the local education agencies above and below the median to allow for special request and follow-up visits. The five largest local education agencies are monitored annually.

Frequency and Delinquent Children On-Site Reviews

The State institutions for neglected/delinquent children are monitored on the following basis. one-half of the six participating institutions are monitored in one fiscal year, and the remaining three are monitored in the next fiscal year. In Fiscal Year 1980, the three institutions located in the eastern half of Kansas will be monitored; and in Fiscal Year 1981 the three located in the western half of Kansas will be visited for monitoring purposes. The applicable statutes and regulations published in the Federal Register, Part IV, April 4, 1974, state that monitoring of these institutions will occur. The monitoring document in Appendix A will be used for this purpose, except for areas 1, 3, 4, and 5, which do not specifically apply to State institutions for neglected/delinquent children. Heavy emphasis of the monitoring will be placed on the eligibility criteria of the children to be served and counted for average daily attendance purposes. The State-funded program requirements will also receive priority.

Issuing and Responding to Monitoring Reports

The State Department of Education issues its findings and recommendations of on-site reviews no later than fifteen calendar days after the program review has been completed. If non-compliance activities are noted, the local education agency must respond in writing, no later than fifteen calendar days, to the Department.

The response contains the corrective action or compliance agreement to be taken by the local education agency to bring the program into compliance. Corrective action must be completed within thirty calendar days of the receipt of the Department's monitoring report.

Appeal

The local education agency may appeal the findings of the monitoring report to the State Commissioner of Education within fifteen calendar days of the receipt of the monitoring report. An appeal committee of no less than three is selected by the commissioner to review the findings and to consider the information from the local education agency. The committee consists of State Department of Education personnel. The appeal process must be completed within thirty calendar days of the appeal request from the local education agency and a decision rendered within fifteen days after the appeal process has been completed.

If the committee confirms the State Department of Education's monitoring report findings and recommendations and finds that after fifteen days there has been failure to comply substantially with the regulations governing Title I, the State Department of Education notifies the local education agency of the action that will be taken to assure compliance.

Action to be Taken

In accordance with Title I and the relevant regulations, the State Department of Education uses one or more of the following methods to ensure action or prompt response to a monitoring report:

(1) Follow-up visits after receiving the applicant agency's response to a monitoring report or for expediting the agency's response to a monitoring report.
(2) Compliance agreements under Section 169(c) of Title I.
(3) Withholding funds under Section 169(a) of Title I.
(4) The State Department of Education's authority to disapprove projects under Section 164 of Title I.

Title I funds may not be used to pay for obligations incurred by a local education agency during a period withholding or disapproval and may not be reimbursed for expenses during a period of withholding or disapproval after compliance is achieved.

The State Department of Education informs the chairman of the parent advisory council on the local level of the disapproval or withholding decision, within fifteen calendar days of notification to the local education agency that disapproval and withholding is in effect.

A local education agency may appeal the final determination of the State Department of Education to the U.S. Commissioner within thirty days of the Department's notice that disapproval or withholding is in effect.

Follow-up by SDE

The State Department of Education makes an on-site follow-up review of the action taken by the local education agency within thirty days after the action was to have been completed.

Availability

A copy of the monitoring report on a Title I project is made available to the district advisory council in accordance with Section 125(c) (2) of Title I. As soon as the agency conducting the project receives the report, it is considered to be public information in accordance with Section 127(c) of Title I.

Non-compliant Practices

The State Department of Education through its application approval process, monitoring reviews, workshops, and regulations issuances emphasizes program compliance and recordkeeping to assure adherence to federal regulations. Withholding of funds and suspension of program approval are applied against a local education agency, if necessary, to assure compliance.

Data Verification

The local education agency and the State Department of Education keep all *source* data used in program development, operation, and financial transactions for review by state and federal officials. Reports submitted to the various divisions and sections within the Department may

be utilized as crosschecks to support or reject the Title I reports. Records maintained in other divisions and sections consist of school accreditation reports, eligible teaching certificates, school lunch free and reduced price count, indirect cost computations, building principal's reports, and school organizational reports.

Audits

The State Department of Education currently has a staff of fiscal auditors that annually conduct budget line and block item audits of all Title I programs. The expenditure of Title I funds as in the approved budget is audited against actual vouchers, purchase orders, invoices, and ledgers to verify the accuracy and compliance with the approved budget. Exceptions and deviations from the approved expenditures are noted on the audit report for resolution by appropriate officials. The accounting procedures and fiscal integrity of the Title I grants are audited during the succeeding fiscal year for which the grant was made available.

Program compliance audits are conducted on a three year cycle. The compliance audit review document is included in Appendix B.

Audit Resolution

The audit report completed by the State Department of Education's audit staff is sent to the coordinator of the State and Federal Programs Administration Section for resolution of findings and recommendations. Within fifteen days of receipt of the audit report, the coordinator will notify the Financial Service Division to seek unexpended funds or funds determined to have been misspent or misapplied. The Financial Service Division must notify the local education agency in writing of its payment obligation within fifteen days of receipt of the coordinator's decision.

Appeal to SDE

The local education agency may appeal the decision of the coordinator to the State Commissioner of Education within fifteen days of receipt of the audit letter. The commissioner selects at least three State Department of Education personnel to review the findings of the audit report and the coordinator's decision and rule on written justification submitted from the local education agency. The local education agency is notified in writing within fifteen days, after receipt of written evidence or a hearing conducted, informing it of the committee's decision.

Payment

A local education agency must repay from non-federal sources or from federal funds (no accountability for which is required to the Federal Government) the amount of funds that has been finally determined through the audit resolution process to have been misspent or misapplied. The payment may be made in either a single payment or in installments over a period not to exceed three years.

Appeal to U. S. Commissioner

In accordance with Section 425(a) of the General Education Provision Act, a local education agency may appeal a final determination of the State Department of Education to the U.S. Commissioner.

If, following an affirmative by the U. S. Commissioner of the final determination of the State Department of Education and such local education agency refuses to repay from non-federal funds those funds which were misspent or misapplied, the State Department of Education promptly notifies the U.S. Commissioner who initiates collection action.

Equitable Services to Private School Children

The State Department of Education reviews the participation of eligible children attending non-public schools through the application approval process, monitoring the program, and evaluation reports to ensure that equitable services and arrangements are afforded to children enrolled in private schools.

The State Department of Education's monitoring review process consists of determining the eligible target areas as related to children attending private schools, when and where services are located, evaluation data, equitable cost per pupil, and involvement of private school officials in the program planning and development stages of the Title I program as related to children attending their schools.

Complaints concerning participation and equitable services for children attending private schools are handled through the local education agencies and the State Department of Education's regular complaint procedures.

SDE Complaint Procedures General

When a signed written complaint or a complaint made in person by recorded deposition or statement is received by the State Department of Education directly, or indirectly via other state or federal agencies, which alleges improper administration of Title I, ESEA, funds or programs, the Department makes a timely investigation and disseminates findings and actions taken by the Department to the complainants and other interested parties.

Referral and Dispatch

All complaints are referred to the director of the State and Federal Programs Administration Section for investigation and resolution. The director acknowledges receipt of complaint with statement that he/she is requesting review and comment from the district. He/she sends a letter with attached copy of complaint letter to the superintendent of the affected district with request for review and comment within fifteen days. If the written complaint is anonymous, the response from the district is voluntary. Response is directed to the director of State and Federal Programs Administration Section.

Upon receipt of district response, a meeting is arranged with the director, coordinator, and specialist of State and Federal Programs Administration Section and other appropriate State Department of Education staff to determine any further actions on the resolution of the complaint.

If an on-site investigation is determined appropriate by the above group, the director appoints a team of no less than three persons nor more than five to make the investigation. The team includes either the coordinator or specialist in the State and Federal Programs Administration Section, a Title I specialist, and either a representative from a local parent advisory council or a representative from a local education agency not included in the complaint. Other persons on the team may include representatives from any division and section of the State Department of Education and/or representatives from a local school district. The team and its leader are charged with making a full investigation of the complaint and writing a report of the findings to be filed with the director.

Conduct of the Investigation

An on-site investigation begins within thirty days from receipt of the complaint. Unless the investigating team leader can cite unusual circumstances which require additional time, the investigation is completed within sixty days following receipt of the complaint. During the course of the investigation sufficient notes are made or mechanically recorded of all testimony or evidence of witness to assist the team leader in writing a full report.

In addition to testimony received from the complainant and witnesses, the team further investigates the allegations through the interviewing and questioning of the local Title I administrator and Title I staff, the school administrator and faculty, school board members, or any other person who may be able to give information to expedite the investigation and the resolution of the issue of complaint.

The complainant or the complainant's representative, or both, and the local education agency involved have the opportunity to present evidence, and to question parties of the dispute and any of their witnesses.

Reports

At the close of the investigation, a final report is prepared by the team leader and submitted to the director of the State and Federal Programs Administration Section. The report includes the following:

1. A summarization of the substance of the allegations in the complaint and the name of the individual citizen, group, or agency making the complaint.
2. A summary of the activities engaged in by the investigating team and a summary of the findings.
3. A statement of recommended actions by the State Department of Education to resolve the issues involved in the complaint.

The director issues the necessary directives to the local education agency administration to resolve the complaint and to prepare a response to the State Department of Education within fifteen days indicating action implemented.

Copies of the State Department of Education's report and the local education agency's action are forwarded to the State Commissioner of Education for proper staff distribution and to the U.S. Commissioner of Education.

Appeal

The complainant and local education agency have the right to appeal the final resolution of the State Department of Education to the U.S. Commissioner within thirty days after receipt of the written decision. Information regarding appeal procedures are distributed to all local education agencies as part of the State Department of Education's guidelines and regulations booklet. Information is sent to all interested parties free of charge upon request.

LEA Complaint Procedures

Complaints against Title I programs and expenditures may be received at local, state, and national levels. The expeditious and reasonable handling of these complaints is necessary for the effective conduct of the program as well as for the promotion of community understanding and involvement. Complaints are translated into constructive suggestions and recommendations for improvement of Title I programs.

The following procedures are outlined for use at the *local* level for Title I, Public Law 89-10.

Complaints Received by the LEA

Record Initiated - A written record containing information pertinent to both the source and nature of the complaint is initiated.

Complaint Hearing - Within fifteen days following receipt of complaint, a hearing concerning the complaint is held by a hearing committee. Recommendations of the committee shall address to answering the complaint. The committee is appointed by the superintendent in conjunction with a parent council representative. No less than two persons are assigned to the committee, preferably the Title I coordinator and a member of the local parent advisory committee.

Hearing Minutes - Minutes of the complaint hearing are taken and maintained at the local education agency. A copy of such minutes along with committee recommendations and administrative action are filed with the State and Federal Programs Administration Section.

State Follow-up - The State and Federal Programs Administration Section maintains a record of all complaint hearings.

The Title I state coordinator reviews the records of the complaint hearing and makes contacts regarding a follow-up and possible remedial action with the local education agency.

If complaint is not resolved to mutual consent of both parties, then either party may appeal to the State Department of Education as outlined in the Department's complaint procedures.

CHAPTER THREE

TITLE I, ESEA IN KANSAS

Start-up In Kansas

Appropriations for Title I programs were first received in Kansas late in 1965 for the school year 1965-66. Kansas was allocated 10.8 million dollars but only about 9.8 million was approved for use in the schools because of the late appropriation date. The early problems centered around obtaining personnel to man the programs (local education agencies) even after monies were received to place an over-emphasis on the purchase of equipment and materials. The first evaluations of local Title I programs were not completed and received by the state until late in 1966.

Below is a table that provides an overall record of what has happened to Title I in Kansas since that first year.

History of Title I in Kansas

Year	Unduplicated Count of Children			Funds Expended	Ave. Cost /pupil	No. of LEA's
	Public	Nonpublic	Total			
1965-66	42,430	5,161	47,591	$ 9,876,468	$203.26	306
1966-67	77,470	8,198	85,668	$ 9,608,706	$112.16	309
1967-68	63,081	6,832	69,913	$ 9,687,073	$128.56	302
1968-69	57,920	6,561	64,481	$ 8,839,164	$137.08	299
1969-70	66,274	3,025	69,299	$ 9,466,504	$136.60	292
1970-71	60,854	2,335	63,189	$ 9,638,770	$152.52	292
1971-72	49,721	1,922	51,643	$ 9,664,169	$187.13	290
1972-73	39,852	1,484	41,336	$ 8,739,646	$211.43	287
1973-74	27,162	1,099	28,261	$ 8,928,811	$315.94	251
1974-75	32,923	1,372	34,305	$11,747,773	$342.45	279
1975-76	32,654	1,671	34,330	$12,269,304	$357.39	280
1976-77	35,778	1,430	37,208	$13,234,019	$355.68	275
1977-78	30,833	1,361	32,194	$14,607,155	$453.93	280

1977-78 Activities and Participants

Reading/Language Arts	30,536
Math	16,605
Social Science/Science	352
Other	2,062

Some students participated in more than one activity.

Trends

Several conclusions are apparent from the previous table:

1. After an early rise, although participation varies widely from year-to-year, the general trend in Kansas is following the national trend of fewer and fewer children participating in the Title I program. However, since Fiscal Year 1975 the number of participants has increased because the amount of available funds has increased.
2. Unlike the national trend, the Kansas appropriations have generally remained remarkably stable (rather than increasing). However, since Fiscal Year 1975 a slight increase in funding is evident.
3. The average cost per pupil has, however, steadily increased to a figure over the "critical mass" figure of $300 per pupil. This ratio could, however, be considered an over-

estimation because the computation is made using the total allocation instead of actual expenditures.

4. The declining number of participating school districts, in part, accounted for by the declining number of school districts (mergers).

The most recent analysis (1977-78) produces the following breakdown for Title I participation in Kansas:

Race/Ethnic		
	— White	25,906
	— Black	3,739
	— Mexican American	1,668
	— American Indian	449
	— Polynesian Oriental	297
	— Other	132

Distribution of Participants by Sex and by Grade Level

Grade Level	*Number of Regular Term Participants in Each Grade Level Who Were . . .*	
	Male	*Female*
Pre-Kindergarten	226	164
Kindergarten	658	473
Grade 1	2,361	1,610
Grade 2	2,742	1,802
Grade 3	2,376	1,580
Grade 4	2,143	1,441
Grade 5	1,880	1,254
Grade 6	1,511	1,037
Grade 7	1,177	748
Grade 8	847	540
Grade 9	417	270
Grade 10	205	116
Grade 11	97	54
Grade 12	81	34
Ungraded	142	112
TOTAL	16,863	11,235

NOTE: 36 additional students were not identified by sex.

CHAPTER FOUR

FINANCE

THE FEDERAL FORMULA FOR ALLOCATING FUNDS

The U. S. Commissioner of Education computes the maximum amount of funds that can be allocated to each eligible county within each state. The maximum allocation is computed by multiplying the average per pupil expenditure by the number of formula children in county. The formula is spelled out below.

This Figure Forty percent of the average per-pupil expenditure in the state, except that if it is less than 80 percent of the U. S. average per-pupil expenditure, then 80 percent will be used. If the state's per-pupil expenditure exceeds 120 percent of the U. S. average, then 120 percent will be used.

Total number of children aged 5 to 17 who are grouped as follows:

Multiplied by This Figure

1. In families below the poverty level on the basis of the most recent data available from the Department of Commerce. In determining the families which are below the poverty level, the commissioner shall utilize the criteria of poverty used by the Bureau of Census in compiling the 1970 decennial census.
2. The number of children in families in excess of the poverty criteria who received payment from state welfare (ADC) plans approved under Title IV of the Social Security Act.
3. The number of children in foster homes supported by public funds on the basis of the caseload data for the month of January.

Produces the Maximum Allocation Figure

4. The number of children in institutions for neglected or delinquent children on the basis of the caseload data for the month of January.

The KSDE's Title I office then suballocates the funds to local education agencies within the counties.

THE STATE FUNDING FORMULA

The following criteria are used by the State Department of Education to determine the number of formula children in each district for Title I allocation purposes:

1. The number of children (ages 5-17) in low-income families according to the 1970 census data (Orshansky index) in each district. This information is provided by the U. S. Office of Education.
2. The number of children (ages 5-17) in families receiving AFDC payments in excess of $6,200 annually.
3. The number of children in locally public/private operated institutions for neglected or delinquent children.
4. The number of children in foster homes supported by public funds within the districts.

The total number of formula children in each district is multiplied by the county Title I per-pupil amount. No school district shall receive less than 85 percent of the previous year's amount.

Example of Formula

District No.	*Low-Income*	*AFDC*	*N/D*	*Foster*	*Total*
USD 200	50	10	0	0	60

60 x 175.00 = $10,500
(County per/pupil amount)

CHAPTER FIVE

APPROVAL OF PROGRAMS

THE CRITERIA FOR APPROVING LOCAL PROGRAMS

Kansas Title I programs must be restricted to corrective and/or preventive educational activities designed to meet the special educational needs of the educationally deprived children residing in target areas:

When applying the above guidelines, several federal regulations must be adhered to:*

1. Title I activities must be programmed so that those activities will be concentrated on a limited number of children.
2. The priority needs of educationally deprived children in the eligible attendance areas are determined in consultation with teachers, parents, private school authorities, and representatives of other agencies which have a genuine and continuing interest in such children. The evidence of need and the basis of the assignment of priorities must be documented. Pre-post standardized test results must be used as one criteria for program selection and evaluation.
3. The application must show that the Title I program is based on a consideration of the relative needs of children at all ages and grade levels and is designed to meet a limited number of high priority needs which cannot be met through the regular school program or other programs.
4. The Title I program and the regular school program must be planned and budgeted to assure the federal funds will supplement and not supplant state or local funds and that state and local funds will be used to provide services in the project areas that are comparable to the services provided in nonprofit areas.
5. Each project must be tailored to contribute particularly toward meeting one or more of the special educational needs of educationally deprived children. Instructional services must be provided in a manner that will best meet those needs. In cases involving non-instructional auxiliary services intended to meet the special educational needs of educationally deprived children receiving instructional services under Title I, participation in non-instructional services under Title I, participation in non-instructional services must be limited to the educationally deprived children participating in the instructional program, except for screening to detect health deficiencies.
6. Title I is categorical aid; it is not general aid, and programs should not be designed to serve all students. Special attention should be given to the most severely educationally deprived children residing in areas of high concentration of low-income families.
7. Supportive services must be supplementary to services available and specifically designed to meet the special educational needs of the Title I participating children. A unique approach for utilizing a non-instructional service might be a legitimate Title I activity. The program must be specifically designed to meet the special educational needs of Title I children and include performance criteria for meeting those educational needs. Traditional services which meet general school needs are not approvable.
8. Parent advisory councils are mandated by law. Therefore, it is a must that councils be established that meet all requirements regarding this provision.

Support Personnel Title I funds cannot be used to finance librarians and/or librarian aides. Other supportive personnel, such as counselors, teacher aides, nurses, psychologists, social workers, cultural enrichment, etc., will be approved only if they are part of a comprehensive program and sup-

---

* It should be mentioned here that this is a summary outline and that there also exists a Federal/State guideline booklet that details these requirements and states the authority.

port Title I students in instructional activities. Salaries of these personnel must be prorated to reflect only the amount of time they serve Title I students. Supportive personnel that serve the entire population of a building cannot be paid solely from Title I funds. The comparability guideline requires that if a local education agency provides a particular service with state and local funds in a non-Title I school, it must provide the same service with state and local funds in Title I schools.

Competency Test Requirements Title I funds cannot be used for remedial classes to help students pass state minimum competency tests. The Title I regulations state that Title I funds shall not be used to provide services which the applicant agency is required to provide by state law.

Since Title I is for educational programs, the Title I office does not approve swimming programs and recreational programs. Cultural enrichment programs must be educationally designed and directly related to upgrading the achievement level of the eligible students. Once the target area is defined as eligible by the low-income criteria, then the program must be designed for the most severely educationally deprived students whether low-income or not.

Each unified school district is also responsible for implementing the following six steps in preparing to request funds for an ESEA Title I Project:

Step 1. ***Low-Income Schools:*** The first step in formulating an ESEA Title I Project is to define attendance areas which qualify for ESEA Title I by using the percentage of children from low-income families in each of his attendance centers. (In determining this percentage, count all children five through seventeen years of age from low-income families living in these centers — those enrolled in the public schools, those enrolled in private schools, and those not enrolled in any school.) This information usually comes from welfare rolls, free lunch, school surveys, or health statistics.

Step 2. ***Target School Identification:*** The requirements of a target school are met if the percent of students from low-income families meets or exceeds the district-wide average. An annual income of $4,000 to $5,000 is appropriate for determination of low-income families in a school district. Free and reduced price lunches are the most commonly used criteria for identification of low-income data.

Step 3. ***Target School Priority:*** Due to the shortage of ESEA Title I funds, all target schools may not be considered initially. It is the responsibility of the local education agency to rank these schools on the basis of percent of students from low-income families and select those schools with the highest percentage for inclusion in the program. All schools selected for Title I services must have a low-income percent at least equal to the district average.

Step 4. ***Educationally Deprived:*** The fourth step is to conduct a learner needs assessment collecting data on the incidence and severity of educational deprivation, particularly data on performance in the basic cognitive skills of reading and math among children in all eligible school attendance areas including children enrolled in private schools and local institutions for neglected and delinquent children. Children with the greatest educational needs must be selected to participate.

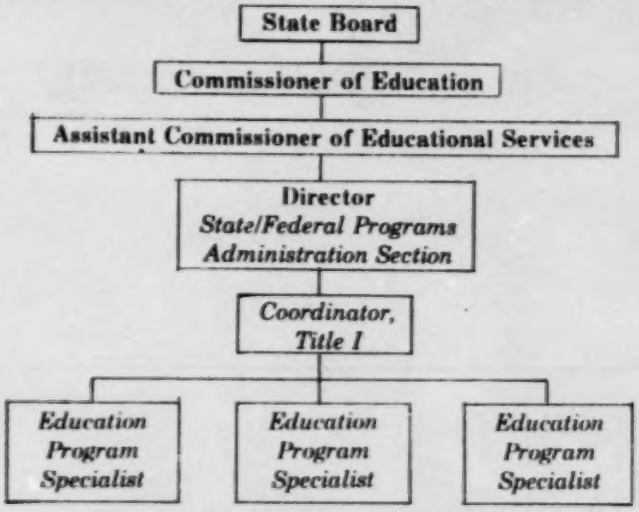
Step 5. ***Instructional Program:*** The instructional program provided by the local education agency with ESEA Title I funds must be designed to meet the specific learner needs identified in the selected target schools, making certain that the greatest amount of learner needs of children residing in areas of the highest incidence of poverty are met first. The instructional program must be clearly supplementary to the regular educational program in terms of personnel, materials, and services. All aspects of the planned ESEA Title I instructional program are planned on the basis of learner needs.

Step 6. ***Accountability:*** Each project must develop performance objectives (learner outcomes) and process objectives (administrative, support and instructional activities) to serve as the basis for an annual evaluation report. It is assumed that all ESEA Title I project activities will demonstrate effectiveness through increased student learning in need areas.

CHAPTER SIX

PROGRAM ADMINISTRATION IN KANSAS

Below is an organization chart that shows the reporting relationships of the professional staff of the section in the Kansas State Department of Education that administers the Kansas Title I program.



The administrative responsibilities of Title I, such as determining allocations, establishing regulations, completing and determining reporting requirements, audit settlements, evaluation requirements, etc., are handled by the State and Federal Programs Administration Section. The section consists of a director, coordinator, and three education program specialists. The section also has administrative responsibilities of some other federal programs.

Currently three education program specialists are assigned the responsibilities of the Title I project approval and monitoring of schools for compliance. Title I funds are disbursed through the Division of Financial Services and audits of financial expenditures are under the supervision of this same division. The State and Federal Program Administration Section is responsible for close coordination of Title I activities within the various divisions and sections.

The State Department of Education will require additional Title I administration funds for the purpose of adding two staff positions involved with monitoring and enforcement. Thus, part of the .5 percent increase will be utilized for adding a program compliance auditor and a fiscal auditor for Fiscal Year 1980 to perform program and fiscal audits of Title I programs.

Additional increase cost related to monitoring and enforcement activities is in the area of travel. The State has increased the per diem allowance for both in-state and out-of-state travel.

Services Program planning and development encompasses the interpretation of and compliance with federal and state guidelines. Needs assessment, selection of target attendance areas, comparability, selection of students, types of programs, parent involvement, advisory committees, general performance and process objectives, and the evaluation design are additional services. Services are extended during the annual Title I regional conferences, on-site visitations, visits to the state agency and telephone and written communications.

On-site Visitations and Monitoring

On-site visitations are conducted to observe programs in operation and to ensure that activities are implemented in accordance with program applications. A ***Monitoring Guide*** is given to local education agencies at the beginning of the program. This booklet answers questions related to the overall operation of the program. It is basically geared to the legal requirements of Title I. It serves as a guide for both the local officials and state program specialists in evaluating compliance with the Title I program. Prior to the on-site visitation by a program specialist, the local official studies and completes the questions pertaining to his program. All visitations are scheduled by the program specialist approximately one week in advance. The program specialist reviews the completed ***Monitoring Guide*** with the program director. The director is asked to support and document his program's compliance with Title I guidelines and the application. Topics in the ***Monitoring Guide*** concern attendance areas, participants, services, supportive services, staffing and staff development, comparability, parent involvement, dissemination, evaluation and fiscal management. This procedure is followed by observation of the program in operation and by conferences with the director and staff of the local program.

Major objectives of the monitoring visitations are as follows:

- to observe the administration of local education agency programs funded by Title I;
- to determine if Title I activities are being implemented in compliance with the program application;
- to learn about problems encountered by local education agencies in implementing Title I programs;
- to offer technical assistance and provide recommendations for Title I program improvement; and
- to provide administrative and consultative assistance involving special and immediate problems confronting Title I personnel as they implement their programs.

Guidance in Evaluation

Each local education agency must submit an annual evaluation report for their approved Title I program. A guideline for the uniform collection of information is provided to each participating local education agency, which builds into the project, well defined performance objectives that can be measured to provide valid and reliable evidence of pupil achievement. The evaluation process and guidelines are explained in detail during the annual conference conducted by the state education agency staff for all administrators and program coordinators.

Accounting and Auditing

The program specialist advises program coordinators on proper and acceptable procedures of Title I program accounting and reimbursement. Auditors from the Fiscal Auditing Section of the State Department of Education audit each local education agency's Title I application annually and present a report to the state Title I office for review and action.

Learner Needs in Basic Areas

The ESEA Title I program in Kansas is committed to the concept of accountability. This involves both a state-level and local-level commitment to initiate Title I projects designed to meet the special educational needs of those educationally deprived children who have the greatest need for assistance. In striving for effectiveness, programs focus on learner needs in the areas of reading and mathematics with emphasis on preschool and the primary grades. Supportive services are supplementary to reading and mathematics and are designed to meet the special educational needs of Title I participating children.

Supportive Needs

In line with this policy, supportive personnel and services such as counselors, teacher aides, nurses, psychologists, social workers, cultural enrichment, etc., were approved only if components of a comprehensive program and if supportive of Title I students in instructional activities.

Needs Assessments

Federal regulations require a comprehensive assessment of the needs of educationally deprived children in the target areas of unified school districts. The state education agency places major emphasis on providing assistance to the local education agency relative to the procedures necessary to accomplish the assessment of needs. Documented student needs pro-

vide information enabling the state education agency to more effectively administer the Title I effort. The needs assessment guides local education agencies in designing more appropriate programs, and it delineates the bases for evaluating the Title I program. Needs assessment is explained in the ***State Title I Guideline and Instruction Handbook*** and is discussed at state Title I conferences for local education agency personnel. Explanations and examples of needs assessment summaries appeared in the State/Federal newsletter which is distributed monthly to the locals. The assessment of needs is incorporated in the ***Monitoring Guideline*** used by the program specialists during on-site visitations.

Regional Meetings A series of conferences, geographically located for the local education agency's convenience, are conducted each spring by state education agency personnel. Administrators, federal program coordinators and other interested personnel from public and nonpublic schools attend these meetings. The Title I application evaluation and other pertinent information comprise the agenda. A total of 275 of the 285 participating local education agencies were represented at the regional meetings in May, 1978.

Guidelines A ***Guidelines and Instructions for ESEA Title I*** manual is compiled for each fiscal year by the state education agency. This manual contains information such as state and federal regulations, general instructions, application criteria and definitions, complete directions for planning and developing programs, completed samples of all forms, fiscal and accounting provisions, evaluation planning, design and measurements, and all Title I forms to be used in the implementation of Title I programs. The manual contains solutions to numerous problems and answers to many questions that arise in fulfilling the requirements for a Title I program.

Auditing Cooperation between the Fiscal Auditing Section and the State and Federal Programs Administration Section of the State Department of Education contributes significantly to quality improvement of Title I programs. The auditors annually audit all local education agency Title I budgets. Their findings are sent to state Title I program specialists who in turn "follow-up" on the audit report.

Direction The state education agency continually requests local education agencies to be more selective in identifying Title I participants. Documentation is necessary in assessing the needs of educationally deprived children. The most pressing needs must be met first. So that resources are not too thinly spread, a minimum expenditure of $300 per student is strongly recommended. Supportive services must be supplementary and specifically designed to meet the special educational needs of the Title I participating children. Specific objective tests are recommended for use by local programs and where they are not possible, standardized measurement forms are provided so that results can be compared.

Statewide Evaluation Report The Title I office has developed easy-to-use standardized forms and procedures for program evaluation as well as procedures for computer analysis of the results of the programs on a statewide basis. Quantitative data summaries and analyses of all local programs are presented along with a complete analysis of district and student participation each year in the annual statewide evaluation report. Each local program receives a feedback document that contrasts the results of its program with the results of other programs and with the state averages for gains achieved.

The Kansas Title I programs follow the procedure for good program accountability as required by the United States Office of Education and federal auditors.

Cooperative Efforts Cooperative effort among sections of the State Department of Education promotes quality in Title I programs. The following activities exemplify this united effort:

1. Eight in-service workshops for Title I teachers were coordinated by State Title I personnel and the State Right-to-Read specialist. Approximately one hundred teachers attended these sessions which were conducted by contracted consultants.
2. The State Right-to-Read plan, designed to bring measurable improvements in the reading skills and attitudes of Kansas children, sponsored workshops to acquaint reading teachers with reading related programs, suggestions, and materials. Topics

for the workshops included: (a) individualized reading, (b) reading diagnosis, (c) use of newspapers in reading, (d) educational television, (e) school visitations and libraries, and (f) behavioral and/or performance objectives. Participants attending the workshops were expected to return to their own school districts and conduct in-service training sessions for fellow teachers.

3. State Title I coordinators of Region VII (Kansas, Missouri, Iowa, Nebraska) attended their fourth annual conference in Kansas City. The two-day conference, also attended by some four hundred teachers and administrators, covered current successful projects, information exchange, needs assessment, and evaluation techniques.

CHAPTER SEVEN

THE FOUR COMPONENTS OF TITLE I

Title I funds are allocated to the State in four distinct categories:

(A) *Public School Funds:* During Fiscal Year 1979, the state received $18,276,268 for distribution to public school projects. A total of 285 different school districts operated Title I programs for the educationally deprived children.

(B) *State Institutions for the Handicapped:* During Fiscal Year 1979, the state received $1,107,450 for distribution to state institutions and day care centers serving handicapped children. A total of 17 different facilities operated Title I programs for the handicapped.

(C) *State Institutions for Neglected and/or Delinquent Children:* During Fiscal Year 1979, the state received $291,673 for distribution to state facilities serving neglected/delinquent children. A total of six different facilities operated Title I programs for these children.

(D) *Program for Migrant Children:* During Fiscal Year 1979, the state received $813,307 for distribution to school districts and other facilities operating programs for migrant children. A total of thirteen different programs were operated during Fiscal Year 1979 with the major area of concentration being in western Kansas.

P.L. 81-874 LOW-RENT HOUSING

PAYMENTS

Title I has an indirect responsibility with the administration of P.L. 81-874, low-rent housing programs.

Payments are made directly from the Office of Education (DSAFA) Washington, D.C. to each local education agency entitled to a grant. The State and Federal Programs Administration of the State Department of Education is responsible for administration, approval, and compliance of P.L. 81-874 low-rent housing projects. A total of $194,000 was available to nine school districts in Fiscal Year 1979.

Section 5(e) of P.L. 81-874, as amended, authorizes the payment of federal funds to local education agencies on the basis of numbers of children in the schools of such agencies who reside in low-rent housing provided under the United States Housing Act of 1937.

It is the intent of the conferees that . . . funds attributable to such children shall be used to continue and augment programs assisted under Title I . . . which would otherwise be eliminated or diminished due to the adoption of the new formula for distribution . . . and to provide Title I type programs in areas which are eligible for Title I assistance but which have not received such assistance, or, if such programs are fully provided in both such cases, for programs in other areas of school districts for such children. The state education agency should monitor the expenditure of these funds for public housing children since that agency has responsibility for monitoring the expenditure of Title I, ESEA, funds.

PROGRAM PRIORITIES

Payments received under this application and attributable to children from low-rent housing will be expended in the following order or priority:

(A) To continue and to augment programs assisted under Title I of the Elementary and Secondary Education Act of 1965 which would otherwise be eliminated or diminished due to the adoption of the new formula for distribution of assistance under Title I as amended by P.L. 93-380;

(B) To provide Title I type programs in areas which are eligible for Title I assistance but which have not received such assistance;

(C) To supplement existing Title I programs; or

(D) To provide Title I type programs in other areas of such agency for educationally deprived children.

APPLICABILITY OF TITLE I REQUIREMENTS

All Title I requirements are considered to be applicable except those pertaining to comparability and the participation of children in private schools.

CHAPTER EIGHT

PARTICIPATION OF UNIFIED SCHOOL DISTRICTS

Participation of Unified Districts

254 unified school districts conducted regular term activities
92 unified school districts conducted summer term activities
80 unified school districts conducted both regular and summer term activities

Participating unified school districts conducted the following Title I activities:

Program Emphasis

Activity	*Number and Percent of USD's conducting possible Title I activities*	
	Regular Term	*Summer Term*
Reading/Language Arts	245	91
Math	94	71
Social Sciences	2	1
Sciences	3	1
Speech Therapy	7	1
Guidance/Counseling	1	1
Home Visitation/Social Work	1	2
Physical Education	0	7
Other	37	25
Total Unified School Districts Participating	254	95

These figures generally support the popular notion that Title I is essentially used (at least in Kansas) for basic skills remediation centering primarily around reading skills but with some emphasis on basic math and language arts.

The Title I office provides guidelines, assistance, and monitoring; however, the unified school districts are responsible for assessing the local needs, designing their own programs, and operating those programs to meet local needs.

TITLE I STAFFING — FISCAL YEAR 1978

Funded Title I Personnel

Staffing

	Full-Time Equivalent Numbers	
	Regular Term	*Summer Term*
Directors or Coordinators	63.9	18.1
Teachers	288.2	570.1
Aides	411.2	164.0
Subject Matter Specialists (Remedial Reading Specialists - Special Certificate)	262.6	80.8
Resource Personnel (Nurses, Speech Therapists, Social Workers)	15.6	11.2
Counselors or Psychologists	2.2	5.4
Tutors	11.8	5.5
Clerical/Secretarial	49.9	51.0
Other	11.8	28.7
TOTALS	1,117.5	934.8

A total of 1,117.5 funded personnel (FTE) were employed in regular term Title I programs in participating local education agencies. In addition, 192 volunteers worked in regular term Title I programs.

In summer term programs, a total of 934.8 funded personnel (FTE) were employed. An additional 78 persons worked in a voluntary capacity.

Participation by Grade A total of 32,194 students (unduplicated count) participated in P.L. 89-10 Title I activities in local education agencies during the fiscal year 1978.

28,134 participated in regular term activities
8,867 participated in summer term activities
4,788 participated in both regular and summer term activities

By grade level student participation was distributed as follows:

	Number of Participants			Percent
Grade Level	Regular Term	Summer Term	Total (Unduplicated)	of All Participants
Pre-Kindergarten	391	398	574	1.8%
Kindergarten	1,131	617	1,415	4.4%
Grade 1	3,975	1,512	4,671	14.5%
Grade 2	4,546	1,382	5,187	16.1%
Grade 3	3,957	1,228	4,526	14.0%
Grade 4	3,586	1,062	4,080	12.7%
Grade 5	3,135	967	3,546	11.1%
Grade 6	2,548	872	2,928	9.1%
Grade 7	1,927	310	2,090	6.4%
Grade 8	1,388	213	1,486	4.6%
Grade 9	657	33	702	2.2%
Grade 10	321	42	340	1.1%
Grade 11	151	34	167	.5%
Grade 12	115	15	122	.4%
Undergraded	276	182	360	1.1%
Total	28,134	8,867	32,194	100.0%

Trend Toward Lower Grade Level The Kansas Title I program has followed the national lead not only in more concentration (increased dollars/child) but also in shifting emphasis to the lower levels. Below are some figures that generally document this.

Since 1969 the percentage of participants in third grade or below . . .

1969 30.4% were 3rd grade or below
1970 37.8% were 3rd grade or below
1971 38.9% were 3rd grade or below
1972 40.2% were 3rd grade or below
1973 45.3% were 3rd grade or below
1974 46.7% were 3rd grade or below
1975 50.2% were 3rd grade or below
1976 46.4% were 3rd grade or below
1977 47.2% were 3rd grade or below
1978 50.8% were 3rd grade or below

CHAPTER NINE

PROGRESS OF THE PROGRAM IN KANSAS

STUDENT ACHIEVEMENT INFORMATION

Federal Requirements State education agencies are required to submit a report to the federal government evaluating the effectiveness of Title I programs. Section 183 of ESEA Title I requires standardization of Title I evaluation and reporting for local school districts and state education agencies. Standardized evaluation models and state forms have been developed that will yield technically sound and comparable evaluation data that can be aggregated across geographic regions, states, districts, and the nation. The data collected by the federal government will be used to report to Congress and other interested parties concerning Title I participation, activities, and impacts.

Although the evaluation procedures are standardized, they allow different model and test instruments to be used. The three evaluation models all define the impact of a Title I project in the same way. The achievement gain is the difference between the actual scores of the Title I students on a post-project test and an estimate of what their performance would have been had they not participated in Title I. The results of any of the evaluations using the standardized procedures are expressed in the same units, Normal Curve Equivalent scores (NCEs).

Interpretation of NCE's Any positive NCE gain score would indicate that the student (group) scored higher than expected. If the Title I program did not have any special effect, a gain score of zero would be expected from the student (group). A zero NCE gain does not mean the student (group) learned nothing between pretest and posttest. A zero NCE gain simply means that the amount of learning was precisely what would have been expected had there not been a Title I program.

All NCE gains greater than zero are considered good. Whenever the evaluation shows an NCE gain greater than zero, it means the Title I pupils profitted from participation in the program. In general, the larger the NCE gain, the more effective the program. It is not possible at this time, however, to designate any specific NCE gain as the criterion for exemplary or outstanding projects.

KANSAS PROGRAM ACHIEVEMENTS - REGULAR TERM

Reading - Kansas Results Both pretest and posttest results were reported for 18,268 (80%) of the students participating in regular term Title I reading/language arts activities. Statewide, participating students demonstrate an average NCE gain of 9.2. The statewide average NCE score prior to Title I participation was 34.1; after participation in Title I for a school year, the average NCE score was increased to 43.3.

Math - Kansas Results Both pretest and posttest results were reported for 7,647 (70%) of the students participating in regular term Title I math instruction. Statewide, participating students demonstrated an average NCE gain of 9.5. The statewide NCE score prior to Title I participation was 31.0; after participating in Title I for a school year, the average NCE score was increased to 40.5.

The above NCE evaluation data for Kansas indicate that Title I programs are having a definite impact on increasing the achievement level of educationally disadvantaged children.

SUSTAINED EFFECTS OF TITLE I

Study of Title I

A recently completed longitudinal study of the reading achievements (over a three-year period) of a sample of Title I students drawn from two Kansas school districts provides evidence that the longer term effects of Title I participation are both positive and sustained.

In the two school districts selected for the study, Chanute (USD #413) and Emporia (USD #253), the students comprising the study sample are students who were Title I participants in the second and third grades during the 1974-1975 school year. Reading achievement test scores, from standarized tests administered during that year (1974-1975) were used to form a baseline. Reading achievement test scores for those same students, from standardized tests administered during the 1977-1978 school year (after three intervening years), were then compared to the earlier scores to assess rates of gain over the three year period. Students in the study sample were divided into four categories depending on length of Title I participation during the three-year period between data points.

Those who, during the three-year period between tests, were ...

1. in Title 1 all three years — n = 33
2. in Title I the first and second year (non-participating during 3rd year) — n = 19
3. in Title I the first year (non-participating during the 2nd and 3rd year) — n = 12
4. non-participating during the three-year period — n = 23

All students in the sample had participated in Title I during the year immediately preceding the three-year study period.

Gain of Title I Students

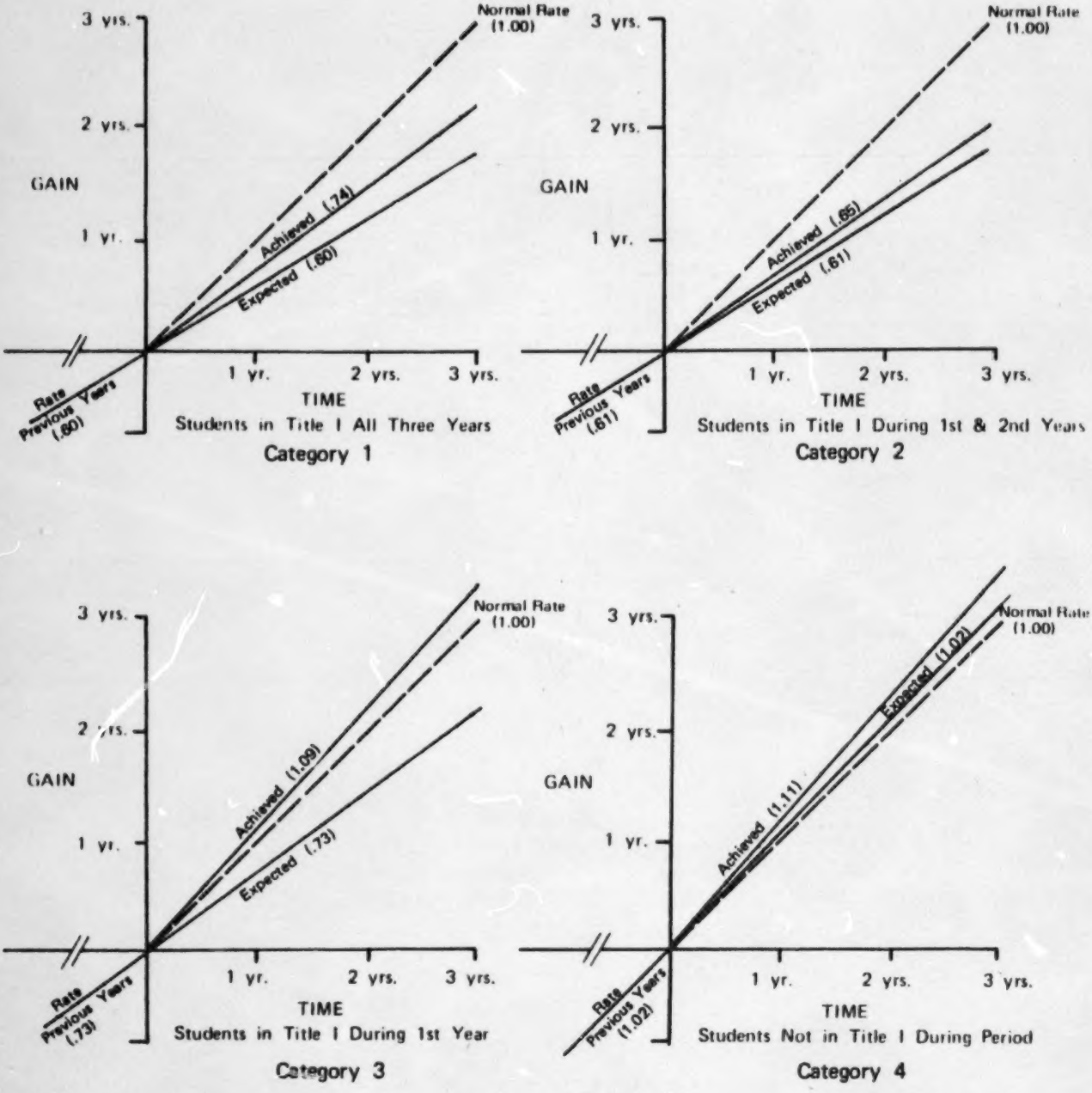
Aggregate average three-year rates of gain for students in each of the four categories are displayed on the following page. ***Expected*** rates of gain on the graphic displays are linear projections of prior years gains for students in each of the four categories. ***Previous years*** rates of gain were computed by dividing each student's baseline grade equivalent score by that student's actual grade level at the time the baseline test was administered. ***Achieved*** rates of gain were computed by subtracting each student's grade equivalent score at the beginning of the three-year period from that student's grade equivalent score at the end of the three-year period and dividing the result by three.

For all categories of students in the sample, those who continued to participate in Title I throughout the three-year study period as well as those whose participation had ended at the beginning or sometime during the three-year period, achieved rates of gain over the period were higher than expected rates.

Since achieved rates are higher than expected rates, the impact of Title I on those students is positive. And since achieved rates are higher than expected rates, even for students no longer participating in Title I, the positive impact of Title I participation for those students appears to be sustained beyond the years of participation.

The study was small in scale and no attempt was made to advise a sample rigorously representative of all Title I projects in the state. While the study findings are an accurate description of the sustained effects of Title I in the sampled schools, caution should be used in generalizing the sample findings to Title I statewide.

Three-Year Aggregate Average Rates of Gain — Grade Equivalent Metric
(Years/Months of Gain per Year/Month of Instruction)
For Various Lengths of Title I Participation



CHAPTER TEN

PROGRESS OF THE PROGRAM ON THE NATIONAL LEVEL

IS TITLE I WORKING ON A NATIONAL LEVEL?

National Goals for Title I

According to USOE, the national goal of the Title I program is to close the educational gap between the achievement level of educationally deprived children and that of average children of the same age (the national norm). USOE headquarters officials say, however, that although closing the gap is an ideal to strive for, a Title I program can be successful without closing the educational gap. Because it is Title I policy to serve the most educationally deprived students, officials maintain that it is unreasonable to expect all of these students to reach this goal. Also, students who achieve the goal probably take more than one year to do so. However, the officials say that the achievement rate of the vast majority of students receiving Title I educational services should be higher than before program exposure, although they do not know how much higher. To close the educational gap, the educationally deprived child must achieve at a greater rate than the average child; that is, more than one year for each year in class until the child reaches his or her grade level. Officials in about two thirds of the state education agencies and local education agencies believed that many of their students were not capable of doing this and that such students would always remain below the national norm.

Success of National Program

Two recent USOE-funded studies, which attempted to synthesize the findings from local, state, and federal evaluations, concluded that ***a positive program impact was evidenced in a few states and in scattered projects in other states.*** The studies also concluded that generally ***there was no evidence of program failure in other states and communities; rather, there was no evidence at all or the evidence was not presented persuasively.*** Both studies' conclusions were based on achievement scores in basic skills, especially reading, and were heavily qualified.

The Title I study was conducted by the Educational Policy Research Center at Stanford Research Institute, where investigators Thomas C. Thomas and Sol H. Pelavin took a critical look at the effectiveness of the federal government's $2 billion annual investment in compensatory education.

Judged by the generally accepted standard of a month's gain in reading achievement for each month of instruction, the SRI report leaves no doubt that Title I can finally be counted as a major success story. The month-for-month gain held up consistently throughout data for six school years from thirty-one states, the largest data base ever collected for evaluation of the Title I program.

Nothing in previous attempts to evaluate Title I prepared Thomas and Pelavin for what they found, which was that schools throughout four different state samples weren't having any trouble measuring up to the unofficial month-for-month standard set by OE. After calculating average monthly gains from 283 state reports representing over three million students across all twelve grades, the research team came up with average monthly gains close to 1.1.

The National Institute of Education conducted a comprehensive three-year study of Title I, ESEA. The study, completed in the fall of 1977, pointed out that Title I has been successful in the following areas: 1) providing additional educational services to disadvantaged children, 2) providing additional funding to school districts with high concentration of low-income students, and 3) promoting the educational advancement of low-income and low-academic students.

The National Institute of Education's study revealed that Title I is superior to other Federal or State funding programs in terms of its capacity to increase education's spending at the local level rather than to replace local expenditures. The preliminary results of the study indicated no outstanding differences among various instructional methods; however, one noted difference was the improvement of first graders' performance when they were taught in their own classroom, confirming the importance of time spent in instruction and on specific learning tasks.

Overall, the results of the study showed that Title I children made significant gains. For example, first graders in the sample made average gains of twelve months in reading and eleven months in mathematics during the seven-month period between pre and posttesting — a gain equivalent to a twelve and fifteen point rise in their percentile scores. Another example is the eight-month gain in reading and twelve-month gain in mathematics made by third graders — a percentile gain of seven and fifteen points.

Other studies, such as "The Effectiveness of Compensatory Education" and "A Study of Compensatory Reading Programs," have found that Title I program participants are producing achievement gains much greater than previous gains made before Title I benefits were available.

CHAPTER ELEVEN

THE FUTURE OF TITLE I

Title I, ESEA was amended and extended by the Educational Amendments of 1978, which became law on November 1, 1978. This new law, P.L. 95-561, extends Title I financial support through Fiscal Year 1983. The state of Kansas is expected to receive twenty-three million dollars funds for program distribution per fiscal year for the next four fiscal years.

APPENDICES

APPENDIX A

KANSAS SEA MONITORING REPORT FORM

Title I of the Elementary and Secondary Education Act requires State Departments of Education to monitor Title I programs at the local level. On-site visits provide State officials with an opportunity to fulfill this responsibility and to offer educational leadership. This document contains questions related to the overall operation of Title I. It is basically oriented to the legal requirements of Title I and should serve as a guide for State and local officials to evaluate the compliance of their Title I programs.

The SEA Title I office is constantly monitoring the ESEA Title I programs. A formal on-site monitoring visit will be conducted of each Title I program at least once every two years.

The monitoring/audit on-site visit will always be scheduled in advance. Therefore, the LEA will have sufficient time for review of the monitoring/audit questions prior to the visit. The on-site visit will normally consist of an entry conference, site activities and an exit conference. The LEA should ensure that the appropriate personnel are available to answer the monitoring/audit questions, to participate in the site activities and to be involved in the entry and exit conferences.

An on-site monitoring visit by the SEA Title I staff will result in a monitoring report citing areas of compliance and noncompliance. The report will be submitted to the LEA within fifteen (15) days of the on-site monitoring visit. The report will detail the nature of any noncompliance situations and describe the necessary actions which are expected of the LEA in order to resolve the monitoring findings. Generally, the LEA is given thirty (30) days to resolve the discrepancies. In all cases, the SEA will provide technical assistance to facilitate the resolution of the monitoring findings.

Federal Regulations, 45 CFR 116.45 require an LEA to retain all Title I records for at least five years. If a Title I or other related audit is pending in the LEA, records must be retained until the audit findings are resolved. The LEA must retain required information in an orderly filing system for easy retrieval of records.

The monitoring areas include:

(1) Target Area Selection
(2) Needs Assessment and Student Selection
(3) Comparability
(4) Parent Advisory Councils
(5) Private School Participation
(6) Evaluation
(7) In-Service
(8) Dissemination
(9) Financial Management
(10) Staff Assignments
(11) Equipment and Materials
(12) Administrative

SELECTION OF TARGET AREAS

Acceptable	*Additional Information Is Needed*	
_____	_____	1. The district maintained worksheets to support the low-income figures on the application.
_____	_____	2. Are the sources of data adequate and the most current available?

Acceptable	*Additional Information Is Needed*	
_____	_____	3. Does data include information on low-income children residing in the attendance area who are: attending private schools, dropouts, residing in institutions for the neglected and delinquent?
_____	_____	4. Do the numbers and percentages of low-income children for each eligible public school attendance area coincide with the application?
_____	_____	5. If selection is based on the number method, is the estimated number of children from low-income families residing in each participating attendance area as large as the average number of such children residing in the district as a whole?
_____	_____	6. If selection is based on the percentage method, is the estimated percentage of children from low-income families residing in each participating school attendance area equal to or greater than such percentage for the district as a whole?
_____	_____	7. If a combination of the percentage and number methods is used, are the number of project areas equal to or less than the number which would be designated if only one such method had been used?
_____	_____	8. If the district states that the entire school district qualifies as a project area based upon the ***no wide variance rule***, is the variation between the highest and the lowest concentration of children from low-income families equal to or less than one-third of the average percentage of children from low-income families in the district as a whole?
		9. If selection is based on the ***25 percent rule***, is there a concentration of low-income children of over 25 percent in the designated or all of the several attendance areas as provided in Section 122(a)?
_____	_____	10. The same criteria for determining low-income was used in all attendance areas.
_____	_____	11. Are any attendance areas designated ***target areas*** based on the provision that permits an area to be eligible if such area or school were eligible in either of the two preceding fiscal years as provided in Section 122(c)?
_____	_____	12. Has the LEA ranked all attendance centers from high to low and served all eligible attendance areas without skipping as provided in Section 122(e)?

COMMENTS:

SELECTION OF PARTICIPANTS – NEEDS ASSESSMENT

Acceptable	*Additional Information Is Needed*	
		1. Lists of participants were available.
		2. The most educationally deprived were selected to participate in accordance with the approved project criteria.
		3. There was additional testing to support any participants selected based on teacher recommendations.
		4. Is actual selection method in accordance with the project application.
		5. If selection is based on a screening device, are the scores of selected Title I participants lower than the scores of non-Title I participants?
		6. The participants reside in the target attendance area.
		7. The instructional staff and grades are aware of the identity of the Title I participants.
		8. During the school year, does the LEA periodically check the growth of Title I students and move them back to their regular class schedule if they are no longer educationally deprived.
		9. Is there a district-wide master list of eligible Title I participants below the cut-off score on file at the central office ?
		10. Is the LEA continuing to provide services to educationally deprived children that have transferred to ineligible areas or schools in the same year as provided in Section 123(c)?

COMMENTS:

COMPARABILITY

Acceptable	*Additional Information Is Needed*	
		1. The district worksheets used to compute comparability were available.
		2. Do worksheets list staff and salaries for each target school?
		3. Do worksheets list staff and salaries for each non-target school?
		4. Are the totals of FTE staff in each target school (a) not greater than 105 percent of FTE staff average for non-target schools (b)?
		5. Are salary totals for each target school (a) not less than 95 percent of the salary average for non-target schools (b)?

Acceptable	*Additional Information Is Needed*	
_____	_____	6. Procedure used by district to assure the maintenance of comparability has been reviewed.
_____	_____	7. Grouping of schools was in accordance with CFR 116a.26i.
_____	_____	8. Are the same types of activities and/or services offered under Title I also offered in the non-Title I schools with state and local funds?
_____	_____	9. If the same type of activity and/or service were offered in non-Title I schools with State and local funds, then determine that a comparable percent of service is offered with State and local funds in the Title I schools by applying the federal audit formula.
_____	_____	10. Are exclusions or inclusions of Special Education and Bilingual program students properly recorded?

COMMENTS:

PARENT ADVISORY COUNCIL

Acceptable	*Additional Information Is Needed*	
_____	_____	1. A building council is not required if there were not more than one (FTE) Title I staff member and more than 40 participating students in each target school.
_____	_____	2. If more than 40 participating students or more than one FTE Title I staff in a building and less than 75 participating students, is a duly constituted council formed? They must have at least a 3 member council composed of at least a majority of parents of participating children and elected (not appointed) by parents in each project area.
_____	_____	3. Target areas with at least 75 or more participating students must have a council of not less than 8 members elected by parents in each project area.
_____	_____	4. Is evidence available to indicate council members serve for a term of two years and may be re-elected?
_____	_____	5. Is evidence available to indicate officers were elected after the council was constituted and names of council members made available to the public?
_____	_____	6. Has a regular schedule of meetings been determined by the council?
_____	_____	7. Is evidence available to indicate that each advisory council has been given responsibility for advising the LEA in the planning, implementation, and

Acceptable	*Additional Information Is Needed*	
		evaluation of its Title I program? Is the information provided on a timely basis before the program is submitted to SEA to adequately consider the program available?
		8. Is evidence available to indicate each council member has been provided, without charge, a copy of the Act, federal regulations and guidelines, and State regulations and guidelines?
		9. Review minutes of the PAC meetings.
		10. Has a district-wide PAC been formed and composed of PAC building council members elected to the district PAC by their respective councils?
		11. Have private school officials and parents of private schools participating Title I children been afforded PAC membership?
		12. Is evidence available to indicate training programs have been planned in consultation with PAC members?
		13. Have council members been provided with appropriate training materials free of charge?
		14. Review expenditure of Title I funds for training and other PAC activities for allowable expenditures.
		15. Are parents aware of the LEA's complaint procedures?

COMMENTS:

PRIVATE SCHOOL PARTICIPATION

Acceptable	*Additional Information Is Needed*	
		1. Were the private school officials consulted and involved in the planning, needs assessment and type of services offered to its eligible participants?
		2. Has there been a separate needs assessment conducted for the nonpublic school students?
		3. Is there nonpublic representation on the PAC?
		4. The participants reside in the attendance area of the target school.
		5. Level of funding per student in the private school is at least equal to the public school expenditure.
		6. Equipment loaned to the private school is accounted for and adequately controlled.

Acceptable	*Additional Information Is Needed*	
		7. The district has adequately managed and supervised the Title I resources used at the private school.
		8. Has a private school official signed off on the nonpublic school certification?
		9. Evaluation data of private school participants must be included in the LEA evaluation report.
		10. Public school personnel made available to the private school on the private school's premises are available only for special services not normally provided by private schools.

COMMENTS:

EVALUATION

Acceptable	*Additional Information Is Needed*	
		1. Is the evaluation design seen as an integral part of program planning?
		2. Is there evidence to assure that the LEA has given due consideration to the inclusion of components designed to sustain the achivements of children beyond the school year in which the program is conducted?
		3. Have the five basic procedures of implementation of Model A been followed?
		USE OF A STANDARDIZED TEST
		TEST AT NORMING TIME
		SELECT PARTICIPANTS, THEN PRETEST FOR EVALUATION PURPOSES
		USE SAME TEST FOR PRE AND POSTTESTING
		FALL TO SPRING TESTING — SPRING TO SPRING TESTING
		4. Are precentile test results being collected?
		5. Have evaluation results from the previous year been reported to the PAC and other interested persons?
		6. Have past evaluation results been utilized in the current program planning and improvements?

Acceptable	*Additional Information Is Needed*	
_____	_____	7. Are evaluation results reviewed in relation to program objectives?
_____	_____	8. Are the evaluation instruments used in pre/post testing the same as specified in the program application?

COMMENTS:

IN-SERVICE

Review documentation to determine if the LEA program involving aides and volunteers has, in effect, a well-developed plan providing for coordinated programs of training in which aides, volunteers and the professional staff whom they are assisting will participate together.

Acceptable	*Additional Information Is Needed*	
_____	_____	1. Review documentation of in-service training and interview the person responsible for in-service training.
_____	_____	2. Has in-service training been implemented?
_____	_____	3. Are in-service training activities consistent with the description in the program application?
_____	_____	4. Is in-service training supplementary to district sponsored activities?
_____	_____	5. Do aides and professionals participate jointly in sessions?
_____	_____	6. Is staff knowledgeable of the Title I program objectives and activities.
_____	_____	7. Review expenditures related to in-service for its appropriateness to the program.

COMMENTS:

DISSEMINATION

Acceptable	*Additional Information Is Needed*	
		1. Has a dissemination plan been implemented in accordance with the approved project?
		2. Dissemination materials were available.
		3. Has the dissemination effort, as implemented, actually informed parents and community of the Title I program?
		4. Has the dissemination effort, as implemented, informed Title I staff and district personnel of program progress and the latest developments and experiments in education?
		5. What sources of dissemination — local paper, radio station, in-service, visitations, consultants, etc. — are used by the LEA?

COMMENTS:

FINANCIAL MANAGEMENT

Acceptable	*Additional Information Is Needed*	
		1. Is there evidence of coordination between the Title I coordinator and the fiscal office concerning expenditures, proper accounting of funds, budget limitations, and audit procedures?
		2. Are current expenditures and obligations consistent with the approved budget?
		3. Are past audit report recommendations being implemented?
		4. Are separate accounting procedures used for carry over funds?
		5. Are there internal periodic reports to assist in avoiding over/under spending in line items?
		6. Has an indirect cost rate been approved and utilized?

COMMENTS:

STAFF ASSIGNMENTS

Acceptable	*Additional Information Is Needed*	
_____	_____	1. Has the staffing proposed in the application been filled?
_____	_____	2. Are the actual duties of employees the same as proposed in the application?
_____	_____	3. Are adequate time records maintained to verify those employees on a partial salary with Title I funds?
_____	_____	4. Are Title I personnel supplementary to the district program and do not supplant activities and services required by the district or offered to non-Title I students by state/local personnel?
_____	_____	5. Does in-service training available to Title I instructional staff provide a general overview of the Title I regulations?
_____	_____	6. Are personnel properly certified in subject and field requirements for their particular assignment?
_____	_____	7. If support personnel are employed with Title I funds, are they providing supplemental services to Title I instructional participants and not general aid?
_____	_____	8. Is there an appropriate per-pupil expenditure of at least $300 for the school year and not more than the district per-pupil cost?

COMMENTS:

EQUIPMENT AND MATERIALS

Acceptable	*Additional Information Is Needed*	
_____	_____	1. Review the updated inventory list and the equipment.
_____	_____	2. Is inventory list complete?
_____	_____	3. Is each piece of equipment properly marked?
_____	_____	4. Are the items purchased (and quantity) appropriate for the type of Title I program conducted and the number of participants?
_____	_____	5. If on order, or to be ordered, will equipment arrive in sufficient time to make an impact on the current program?
_____	_____	6. Has inventory been updated to eliminate equipment no longer appropriate for the program?
_____	_____	7. Are materials supplementary to those supplied by the district?

Acceptable	*Additional Information Is Needed*	
		8. Are requested materials being delivered in sufficient time to make an impact on the current project?
		9. Are materials and supplies used exclusively by Title I participants?
		10. Review budget classification for expenditures on supplies and equipment for appropriate line item budget.

COMMENTS:

ADMINISTRATIVE

Acceptable	*Additional Information Is Needed*	
		1. Is evidence available to verify that teachers and school boards or comparable authority responsible to the public with jurisdiction over the schools, have been involved in the planning of Title I and will be involved in the evaluation of such program?
		2. Review procedures of the LEA that will permit parents of participating children the opportunity to participate in the establishment of such programs. Parents are informed of, and permitted to make recommendations with respect to, the instructional goals of the program and the progress of their children, and such parents are afforded opportunities to assist their children in achieving such goals.
		3. Review data used in determination of maintenance of effort. Information is consistent with other data reported to SEA, school lunch, 18E, financial reports.
		4. Review LEA's written complaint procedures as required in Section 128.
		5. If Title I staff were assigned non-instructional duties, certify that the time involved does not exceed the same proportion of total time assigned similarly situated personnel at the same site, or ten 10 percent, whichever is less.
		6. Review LEA's procedures for regular internal monitoring activities that would spot present or future problems.

Acceptable	*Additional Information Is Needed*	
_____	_____	7. Has a regular term program been implemented if the LEA's allocation exceeds $20,000?
_____	_____	8. Physical facilities are adequate for all activities.

COMMENTS:

ADDITIONAL MONITORING ITEMS FOR INSTITUTIONALIZED NEGLECTED OR DELINQUENT CHILDREN IN STATE-OPERATED OR SUPPORTED SCHOOLS

1. Can the institution verify the eligibility of the children to be counted or to be served?

To be eligible to be counted in ADA or to be served the child must:

	YES	NO
A. Be under 21 years of age and must not have obtained a high school or equivalency diploma.	☐	☐
B. Reside in an institution which meets the requirements of the definition of an institution as defined in the Regulations.	☐	☐
C. Reside in the institution 24 hours a day.	☐	☐
D. Be one for whom a State agency has direct responsibility for providing a free public education.	☐	☐
E. Be in an organized program of instruction (not beyond grade 12) which is supported by other than Federal funds for at least five hours per week.	☐	☐

2. Can the institution verify the computation of ADA as noted in items A and B?

Only children in an ***organized program of instruction*** as defined in 116c.5(d) are eligible to be counted.

116c.5(c)

For purpose of computing ADA:

A. A child is counted as being in a full day of attendance for each day he or she attends the organized program of instruction for three or more hours.	☐	☐
B. A child is counted as being in one-half (1/2) day of attendance for each day he or she attends the organized program of instruction for at least one hour, but less than three hours.	☐	☐

3. Can the institution verify that 116c.11, as noted above, is being followed in its Title I program?

Funds are used to meet the special education needs of children who are eligible to be counted for ADA purposes in accordance with Sec. 116c.5.	☐	☐

APPENDIX B

KANSAS TITLE I PROGRAM COMPLIANCE AUDIT REVIEW

Section 170 of Public Law 95-561 requires each state to make provisions for audits of expenditure of funds, to determine, at a minimum, the fiscal integrity of the grant financial transactions and the compliance with applicable statutes, regulations, and terms of the grant.

A fiscal audit will be conducted annually by the state education agency audit staff. A compliance program audit related to program statutes, regulations and guidelines will be conducted in every LEA at least once every three years.

The compliance review document will be used by state education agency audit staff to determine program compliance and is not intended to be all inclusive. Additional analyses, areas, and records may be reviewed to assure accountability and to that programs are administered in accordance with the provisions of the law and federal regulations.

In determining the scope of review, the auditor should exercise professional judgment and express opinion based on examination of documents made available on inquiry and observation. Opinions may be changed if LEA's provide the necessary supporting documentation of a compliance problem if provided to the SEA within 30 days of the audit review.

Selection of Target Areas

1. Obtain the LEA worksheets on the data used in selection of eligible target areas. Trace the figures used to determine target areas as identified on the approved application for accuracy and eligibility.

   FINDINGS:

2. Review data used to determine low-income averages for consistency. The same indicators should be used in all buildings.

   FINDINGS:

3. Please specify if any of the following methods were used in identification of target areas:

   (A) 25% rule
   (B) 1/3 no-wide variance
   (C) Grandfather Clause (prior year qualification)
   (D) Numerical or combination of percent and numbers

   FINDINGS:

Selection of Participants

1. Interview project director to determine procedures used to select participants. Compare this procedure to the selection criteria specified in the approved application.

   FINDINGS:

2. Obtain a listing of participants in a project school and their test selection scores. Determine if the students were those who had the greatest need (lowest scoring children).

   FINDINGS:

3. Review test selection method to determine that children were not participating who have scored at or above the norm (50%, grade level equivalent, etc.).

   FINDINGS:

4. Determine if diagnostic testing was done to assess individual problems for project emphasis and content.

   FINDINGS:

Staff

1. Compare the project application personnel list to determine if those were the only persons receiving Title I payments.

   FINDINGS:

2. Interview selected Title I personnel to determine if position specified in the application was accurate.

   FINDINGS:

3. Determine that Title I paid personnel (professional/non-professional) were used as supplemental and not replacement of general staff and/or general aid.

   FINDINGS:

4. Review the documentation of in-service training sessions to determine if joint training between aides and professional staff were conducted.

   FINDINGS:

Comparability

1. Compare the LEA's comparability report classification of Title I schools against the Title I schools on the approved application to verify they are the same.

   FINDINGS:

2. Review the LEA's grouping of schools to verify they were done in accordance with the regulation.
   FINDINGS:

3. Review the LEA's workpapers used to complete the comparability report for mathematical accuracy.
   FINDINGS:

4. Review sample of enrollment data, employee records, payroll records, salary schedules, personnel schedules, etc., to determine if comparability was computed as required by regulations. Please review FTE staff assignments and longevity.
   FINDINGS:

5. Please note any allowable exclusions such as special education and bilingual students for consistency.

Maintenance of Effort

1. Review source data financial information used to determine that maintenance of effort listed on application was correct.
   FINDINGS:

2. Review indirect cost rate percent and determine if correct amount was applied against expenditures.
   FINDINGS:

Private School Children Participation

1. Interview project director to determine procedures and examine available documents as evidence that the LEA has given private school children an opportunity to participate.
   FINDINGS:

2. Review expenditure of funds for services provided to private school children to determine if Title I per/purpil expenditure was at least equal to expenditures for public school children.

   FINDINGS:

3. Randomly select private school participating children to determine if they resided in eligible Title I public school attendance area.

   FINDINGS:

4. Review Title I procedures of providing equipment on private school premises to verify it is used only for Title I purposes and is removed when no longer needed for project.

   FINDINGS:

Parent Advisory Councils

1. Determine that a district-wide advisory council was established by review of minutes, notices, and other written documentation.

   FINDINGS:

2. Review records to determine if parent advisory councils were established in each target area as required.

   FINDINGS:

3. Review records to verify that PAC members were elected by other parents and not appointed by school personnel.

   FINDINGS:

4. Verify that PAC members were furnished copies of the regulations and guidelines.

   FINDINGS:

Equipment - Materials

1. Review list of updated equipment inventory to determine location, properly marked and use for Title I project only.

   FINDINGS:

2. Review disposition of any equipment for state approval.
   FINDINGS:

3. Review sale or trade-in records to determine that proper procedures and regulations were applied.
   FINDINGS:

4. Review purchase of material/equipment requisitions to determine if orders placed and materials received were approved by State and used only by Title I personnel.
   FINDINGS: